UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SHEENA M. LEE, Individually and on Behalf of All Others Similarly Situated

Plaintiff(s)

-against-

B&Z AUTO ENTERPRISES, L.L.C. d/b/a Eastchester Chrysler Jeep Dodge,

Defendants.

Case No. 1:19-CV-07450 OCT 2 5 2019

6 D A L6

MOTION FOR EXTENSION OF DEFENDANT'S TIME TO RESPOND TO COMPLAINT

The undersigned counsel on behalf of Defendant B&Z Auto Enterprises, L.L.C. d/b/a Eastchester Chrysler Jeep Dodge hereby moves this Court for a brief extension of time from today's deadline, up to and including November 1, 2019, for Defendant to answer, move, or otherwise respond to Plaintiffs' Complaint. This is Defendant's second request for an extension, and is due to the undersigned counsel being out of the office today after an automobile accident that resulted in a hospital visit. This request is made without consent because, although I telephoned Plaintiffs' counsel today concerning my situation and left a message to request consent, I was unable to obtain a response before this filing. This brief extension will not impact any other scheduled deadlines or appearances. I thank the Court for its consideration in this matter.

Dated:

Garden City, New York October 24, 2019

SO ORDERED

HON, ALISON J. NATHAN UNITED STATES DISTRICT JUDGE

10 25 19

Respectfully Submitted,

Labonte Law Group, PLLC

By: /s/ Scott H. Mandel
Scott H. Mandel, Esq.
333 Jericho Turnpike, Ste. 200
Jericho, NY 11753
(516) 280-8580
smandel@labontelawgroup.com

Counsel for Defendant